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Reply comments: **RM 8658**

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To Whom It May Concern:

After a careful review of the comments by private citizens, consumer groups and the industry regarding hearing aid compatible telephones particularly related to digital telecommunications equipment, I submit the following comments.

There seems to be much resistance by the industry to the concept of universal design of all products and services. As a person with a hearing loss, a hearing aid user and the president of the MN State Association of SHHH Inc., I urge you to disregard these protests and reverse the exemption on digital wireless communications devices and that all products be fully accessible to users with hearing aids. Unless this universal access is mandated, the industry will continue to produce products and design services that are not usable by persons who use hearing aids. This will effectively limit the ability of people who use hearing aids to compete in business or the job market, especially new and emerging jobs sectors and/or access services options.

It is no secret (in fact a review of current advertisements for these new/emerging telecommunications products will confirm this statement) that the industry is creating a new way of doing business for both the producer and the consumer. People unable to use the new and emerging technologies and processes, as a business or as a consumer, will experience a disadvantaged in business, job seeking and everyday activities. This should not happen since the ability to produce products that are universally accessible is readily achievable in almost all cases.

Some comments suggested that making the product compatible with hearing aids that use t-coil technology is not feasible, and offer that access can be achieved via other "external" devices. However, we are asked as users to pay and additional costs for these access devices. This is not equal access. If I use a wheelchair I am not asked to pay for the cost of the ramp to enter their place of business.

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The Cellular Telecommunications and Internet Association (CTIA) commented that; "Since hearing aids are designed to accommodate the unique configuration of a person's hearing loss, this varying nature of hearing aid devices defies the standardization process (page 6, bullet #2 line #2)." I do not understand the logic of this argument. As long as a cell-phone device delivers a signal that is compatible with my hearing aid's t-coil, the only change is how the sound is received by the hearing aid. The signal received is directed into the hearing aid circuits of my hearing aid through the t-coil instead of my hearing aid's external microphone. Once the signal is received by the t-coil, it is directed through the hearing aid's circuits, which are configured to match specific needs I have based on hearing loss, and then delivered to my ear via my ear mold. If a standardized signal cannot be delivered to the t-coil of a person's hearing aid how can they develop a standardized signal to deliver through a hearing aid's microphone? The internal circuits reconfigure this sound for the person's hearing loss.

I believe another key statement made in one comment by the CTIA, "There are some hearing aids on the market that can be used successfully with some digital phones (page 6 bullet #4, line #1)." The potential danger of this argument is that the industry could contend that as long as there is *a* product that is accessible, that would fulfill the requirements of the whole law. But as many previous comments have stated (see A.G. Bell Association, et. al.) the product that is accessible will at times deliver a lower quality of signal and costs more to use than the newer and more advanced units.

Please do not let the digital evolution in the telecommunications industry become a barrier to full participation for people who use hearing aids. A mandate for universal design and access may delay some product releases and may add a few cents to some products. This, however, is much more acceptable than creating barriers that will prevent a large segment of the population of United States from full participation in society as a business person, employee, consumer and/or citizen.

Sincerely,

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